

REMARKS/ARGUMENTS

Claims 1-22 remain in the application.

A. Rejections under 35 U.S.C. 102.

Claims 1, 2, 12-15, and 17 were rejected under 35 U.S.C. 102 based upon Lewis. This rejection is respectfully traversed.

Claim 1 calls for, among other things, reformatting request/response traffic at least once in at least one intermediary computer between the first and second computer. At least this feature of claim 1 is not shown or fairly suggested in the Lewis reference.

At column Lewis describes a system in which messages are passed between servers, but there is no teaching of request-response traffic between computers. Transformation server 100, for example, reformats incoming messages according to rules for that message type, then places reformatted messages on a message bus with no apparent expectation of a response message. Controller 105 may or may not pick a message from the message bus based on whether the message is of a type it handles. Because Lewis lacks a request-response traffic, the reference cannot show or suggest reformatting request/response traffic as called for in claim 1.

Claims 2 and 12-15 that depend from claim 1 are allowable over Lewis for at least the same reasons as claim 1. Further, claim 2 calls for activities including generating a response to the client request in the server and at least one of the intermediary computers and forwarding the server response after reformatting from the at least one intermediary server to the client. It is not clear how the cited portion of Lewis discloses generating a response as called for in claim 2, nor does Lewis suggest reformatting a response in an intermediary server. The Lewis citation refers only to reformatting incoming messages into a format recognized by a server, not reformatting responses.

Moreover, Lewis does not make any hint or suggestion that special needs of a client are taken into consideration as called for in claim 12,

reformatting in a second intermediary computer as called for in claim 13-14, or reformatting data included in responses only. These elements of dependent claims 2 and 12-15 are not shown or fairly suggested by Lewis. It is respectfully requested that the rejection be withdrawn.

Claim 17 calls for first and second connection components as well as reformatting components, all of which are embodied in an intermediary computer coupled to a network. These limitations are distinct from the invention of claim 1, however, the Office action only states that claim 17 is rejected for the same reasons stated above. However, the Office action never even alleges that Lewis shows first and second connection components, or reformatting components within an intermediary server. Accordingly, the office action fails to state a prima facie case of obviousness and the rejection should be withdrawn.

B. Rejections under 35 U.S.C. 103.

Claims 3, 4, 11 and 18-21 were rejected under 35 U.S.C. 103 based upon Lewis in view of Guck. This rejection is respectfully traversed.

Claims 3, 4 and 11 depend from claim 1 and are distinct from Lewis for at least the same reasons as claim 1. Guck does not supply the deficiencies of the Lewis reference. Specifically, Guck does not show or suggest an intermediary computer between first and second computers in which the intermediary computer reformats the request/response traffic. Instead, Guck shows a system in which file conversion is performed on a server. There is no hint or suggestion to move the conversion functionality into an intermediary server as called for in claims 3, 4 and 11.

Moreover, the office action does not even suggest that Guck does teaches converting executable program constructs called for in claim 4, or changing compression levels as called for in claim 11. Hence, the Office action fails to state a prima facie case of obviousness against these claims. Withdrawal of the rejection is respectfully requested.

Claims 18-21 depend from claim 17 and are allowable for at least the same reasons as claim 17. It is noted that, in total, the only expressed grounds of rejection of claims 17-21 is "similar reasons as stated above". However, these claims each contain limitations that are distinct from claim 1 and that have not ever been explicitly acknowledged or rejected. Accordingly, a prima facie rejection has not yet been made and it is respectfully requested that the rejection be withdrawn.

Claim 5 was rejected under 35 U.S.C. 103 based upon Lewis in view of Sobeski. This rejection is respectfully traversed. Claim 5 depends from claim 1 and is distinct from Lewis for at least the same reasons as claim 1. Sobeski does not supply the deficiencies of the Lewis reference. Specifically, Sobeski does not show or suggest an intermediary computer between first and second computers in which the intermediary computer converts between a Java script component and an ActiveX component. There is no hint or suggestion to move the conversion functionality of Sobeski into an intermediary server as called for in claim 5. Accordingly withdrawal of the rejection of claim 5 is respectfully requested.

Claims 6 and 7 were rejected under 35 U.S.C. 103 based upon Lewis in view of Kunita et al. Claims 8, 9 and 22 were rejected under 35 U.S.C. 103 based upon Lewis in view of the examiner's taking of Official Notice. These rejections are respectfully traversed. Claims 6, 7, 8, 9 and 22 are allowable for at least the same reasons as the claims from which they depend. Although the additional references show specific types of conversion processes, the claims do not call for simply performing a particular type of conversion. Instead, the claims are limited to performing the specified conversion in an intermediary server. The combined references do not show or suggest claims 6-9 or 22 and the rejection should be withdrawn.

Claim 16 was rejected under 35 U.S.C. 103 based upon Lewis in view of Nelson. This rejection is respectfully traversed. Claim 16 calls for several limitations related to finding and pointing to network resources (e.g., servers,

peripherals, etc). Nelson, in contrast, appears to deal with finding merchandise from on-line vendors. It is not clear that Nelson is analogous to the invention of claim 16. Moreover, Nelson does not discuss embedding resources or forwarding request/response traffic after embedding as called for in claim 16. For at least these reasons claim 16 is allowable over the relied on combination of references.

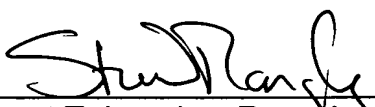
C. Conclusion.

The references that were cited but not relied upon are no more relevant than the references that were relied upon. In view of all of the above, the claims are now believed to be allowable and the case in condition for allowance which action is respectfully requested. Should the Examiner be of the opinion that a telephone conference would expedite the prosecution of this case, the Examiner is requested to contact Applicants' attorney at the telephone number listed below.

This response is filed together with a request for a three month extension of time and the required fee. Any fee deficiency associated with this submittal may be charged to Deposit Account No. 50-1123.

Respectfully submitted,

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